

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

PJC LOGISTICS, LLC,)
Plaintiff,)
vs.)
ABF FREIGHT SYSTEMS, INC.; ALAN)
RITCHEY, LTD.; BALDWIN)
DISTRIBUTION SERVICES, LTD;)
DEDICATED LOGISTICS LLC; FFE)
TRANSPORTATION SERVICES, INC.;)
GREATWIDE DISTRIBUTION)
LOGISTICS, LLC; HEB, INC.; JAMES)
HELWIG & SONS, L.P.; JAMES)
HELWIG & SONS, LLC; LONE STAR) Civil Action No 3:11-cv-00548-F
TRANSPORTATION LLC;)
PAN AMERICAN EXPRESS INC.;)
PARKWAY TRANSPORT INC.;)
ROYAL FREIGHT LP; SKINNER)
TRANSPORTATION INC.; STAN)
KOCH & SONS TRUCKING INC.;)
STEVENS TRANSPORT INC.; TEXAS)
STAR EXPRESS CORP.; TRUCKS FOR)
YOU INC.; WESTERN FLYER)
EXPRESS INC.)

Defendants.

**UNOPPOSED MOTION TO EXTEND TIME FOR CERTAIN
DEFENDANTS TO ANSWER THE COMPLAINT**

Defendants ALAN RITCHIEY, INC.; BALDWIN DISTRIBUTION SERVICES, LTD.; FFE TRANSPORTATION SERVICES, INC.; GREATWIDE DISTRIBUTION LOGISTICS, LLC; HEB, INC.; JAMES HELWIG & SON, L.P.; JS HELWIG & SONS, LLC; MELTON TRUCK LINES, INC.; PAN AMERICAN EXPRESS, INC.; PARKWAY TRANSPORT, INC.; ROYAL FREIGHT, LP; SKINNER TRANSPORTATION, INC.;

STAN KOCH & SONS TRUCKING INC.; STEVENS TRANSPORT, INC.; TEXAS STAR EXPRESS CORP; TRUCKS FOR YOU, INC.; and WESTERN FLYER EXPRESS, INC. (collectively the “Moving Parties”) respectfully move the Court for an order, pursuant to Rule 6(b) of the Federal Rules of Civil procedure, extending the time to serve an answer to the Complaint as set forth below.

1. Plaintiff commenced this action against the Moving Parties and other defendants by filing a Complaint with this Court on March 16, 2011.

2. The Moving Parties were served with the Complaint on July 8, 2011.

3. The current deadline for the Moving Parties to serve an answer to the Complaint is July 29, 2011.

4. On April 13, 2011, Qualcomm Incorporated filed a motion, pursuant to 28 U.S.C. § 1407, with the Judicial Panel on Multidistrict Litigation, seeking centralization of this action and all related actions in the District of Minnesota (the “Transfer Motion”). The Transfer Motion has been docketed as *In re Vehicle Tracking and Security System ('844) Patent Litigation*, MDL No. 2249 and is scheduled to be heard on July 28, 2011.

5. Accordingly, in the interests of judicial economy, the Moving Parties respectfully request that the Court extend the deadline for the Moving Parties to serve an answer until the earlier of (a) 45 days after the Judicial Panel on Multidistrict Litigation issues a decision on the Transfer Motion or (b) September 12, 2011.

6. Plaintiff does not oppose this motion and agrees to the extension of time as requested herein.

Dated: July 15, 2011

Respectfully submitted,

BRACEWELL & GIULIANI LLP

/s/ Alan D Albright

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Counsel for Defendants - ALAN RITCHIEY, INC.; BALDWIN DISTRIBUTION SERVICES, LTD.; FFE TRANSPORTATION SERVICES, INC.; GREATWIDE DISTRIBUTION LOGISTICS, LLC; HEB, INC.; JAMES HELWIG & SON, L.P.; JS HELWIG & SONS, LLC; MELTON TRUCK LINES, INC.; PAN AMERICAN EXPRESS, INC.; PARKWAY TRANSPORT, INC.; ROYAL FREIGHT, LP; SKINNER TRANSPORTATION, INC.; STAN KOCH & SONS TRUCKING INC.; STEVENS TRANSPORT, INC.; TEXAS STAR EXPRESS CORP; TRUCKS FOR YOU, INC.; and WESTERN FLYER EXPRESS, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was served upon all counsel of record via the Court's Electronic Case File System on July 15, 2011.

/s/Alan D Albright
Alan D Albright

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Defendants.

**ORDER GRANTING UNOPPOSED MOTION TO EXTEND TIME FOR
CERTAIN DEFENDANTS TO ANSWER THE COMPLAINT**

The Court having considered Defendants ALAN RITCHEY, INC.; BALDWIN DISTRIBUTION SERVICES, LTD.; FFE TRANSPORTATION SERVICES, INC.; GREATWIDE DISTRIBUTION LOGISTICS, LLC; HEB, INC.; JAMES HELWIG & SON, L.P.; JS HELWIG & SONS, LLC; MELTON TRUCK LINES, INC.; PAN AMERICAN EXPRESS, INC.; PARKWAY TRANSPORT, INC.; ROYAL FREIGHT, LP; SKINNER

TRANSPORTATION, INC.; STAN KOCH & SONS TRUCKING INC.; STEVENS
TRANSPORT, INC.; TEXAS STAR EXPRESS CORP; TRUCKS FOR YOU, INC.; and
WESTERN FLYER EXPRESS, INC . (collectively the “Moving Parties”) motion for an
extension of time to answer or otherwise plead in the reference action has merit.

Accordingly, in the interests of judicial economy, the Moving Parties’ motion to extend the
deadline for the Moving Parties to serve an answer until the earlier of (a) 45 days after the
Judicial Panel on Multidistrict Litigation issues a decision on the Transfer Motion or (b)
September 12, 2011 is GRANTED.

Dated: _____

Honorable United States District Court
Judge Royal Furgeson